Before the Federal Communications Commission Washington, DC 20554

In the Matter of)	
)	
Application of Cellco Partnership	j	
d/b/a Verizon Wireless and	j	WT Docket No. 12-4
SpectrumCo, LLC for Consent to)	
Assign Licenses	ĺ	
	ĺ	
Application of Cellco Partnership	ĺ	
d/b/a Verizon Wireless and Cox TMI	ĺ	
Wireless, LLC for Consent to Assign	ĺ	
Licenses	í	

MOTION FOR EXTENSION OF TIME TO FILE REPLIES TO RESPONSES AND OPPOSITION

Public Knowledge, Free Press, Media Access Project, National Telecommunications Cooperative Association, the Open Technology Initiative of New America Foundation, Rural Telecommunications Group, and Sprint Nextel Corporation respectfully request that the Commission grant a two-week extension of the time to file replies to responses and oppositions. Verizon, SpectrumCo, and Cox (the "Applicants") have not fully disclosed the text of commercial agreements integral to the proposed transaction. Numerous parties have argued that allowing the Applicants to circumvent document-production requirements would deny the public a right to participate in this proceeding in a meaningful way. The Applicants have responded that, despite the FCC's adoption of a strict protective order limiting access to proprietary or confidential information, unredacted information relevant to the transaction is still not required. While the Commission deliberates these issues, additional time to respond to the Applicants' opposition will help mitigate

the prejudice that production delays and reliance on incomplete record evidence would otherwise produce.

On Friday, March 2, Applicants Verizon, SpectrumCo, and Cox filed their Joint Opposition To Petitions To Deny and Comments.¹ Although the redacted version of this filing was quickly available to opposing parties, opposing parties could not review all of the arguments without the unredacted filing. As late as Monday, March 5, 2012 many opposing parties still had not yet proven able to fully review the confidential material due to the delays associated with obtaining access to the unredacted filings from the Applicants. These delays alone support an extension in the time the Commission allots for opposing parties to file replies to Applicants' arguments. The Commission should ensure that opposing parties have as full a chance to read, analyze, and respond to confidential material as they do with the public material.²

The novelty and importance of this transaction provide further grounds to grant an extension of time. By linking large spectrum transfers to a series of joint commercial agreements, the parties propose to profoundly change the nature of competition in several communications markets. Never before have cable and telephony companies proposed to work so closely together, and rarely have erstwhile competitors in any industry planned to begin jointly marketing and

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¹ Joint Opposition to Petitions to Deny and Comments of Cellco Partnership D/B/A Verizon Wireless, SpectrumCo, LLC, And Cox TMI Wireless, LLC, WT Docket No. 12-4, (filed Mar. 2, 2012).

² Of course, if the Applicants provide complete copies of the transaction documents subject to protective order, parties will need additional time to review the new material, which further justifies granting this Motion.

developing products so closely. These new issues require additional time to consider.

Finally, an extension of time at this stage, while necessary for opposing parties, is unlikely to delay the overall proceeding, and will not prejudice the Applicants. In this matter, there is no commercial deal that must be closed by a date certain, no bankruptcy, and no failing firm. Even according to Verizon, its self-diagnosed spectrum shortage will not become acute until 2015.³

For these reasons, the undersigned respectfully request a two-week extension of time to file replies.

/s/ John Bergmayer

Public Knowledge

/s/ S. Derek Turner Free Press

/s/ Andy Schwartzman Media Access Project

/s/ Jill Canfield National Telecommunications Cooperative Association Respectfully submitted,

/s/ Michael Calabrese Open Technology Initiative New America Foundation

/s/ Caressa D. Bennet Rural Telecommunications Group

/s/ Trey Hanbury Sprint Nextel Corporation

March 7, 2012

³ Joint Opposition, Exhibit 2 (Supplemental Declaration of William H. Stone), ¶ 3.